

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Donnell Lee Clark

Case: 2:25-mj-30112

Assigned To : Unassigned

Case No.

Assign. Date : 3/4/2025

Description: CMP USA V.

SEALED (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 5, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

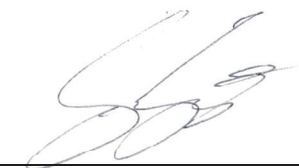
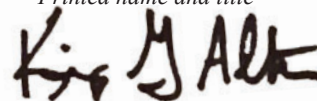
18 U.S.C. 1951

Interference with commerce by robbery (Hobbs Act Robbery)

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 4, 2025City and state: Detroit, MI

*Complainant's signature***John Cozzi, Special Agent***Printed name and title*

*Judge's signature***Hon. Kimberly G. Altman U.S. Magistrate Judge***Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, John Cozzi, being first duly sworn, hereby depose and state as follows:

Introduction and Background

1. I am a Task Force Officer with the Federal Bureau of Investigations (FBI), and have been since January of 2020. I am assigned currently to the FBI Detroit Division's Violent Crime Task Force ("VCTF"). Prior to my assignment at the FBI, I was assigned to the patrol division of the Northville Township Police Department in Northville, MI. Prior to my employment with the Northville Township Police Department, I received a bachelor's degree in criminal justice and sociology from Western Michigan University. I graduated from the Wayne County Regional Police Training Center where I received my certification to work as a Law Enforcement Officer in the State of Michigan. I have attended in-service training courses pertaining to investigations, interviews, interrogations, narcotics, firearms, and more. As both a Northville Police Officer and FBI Task Force Officer, I have conducted or assisted in numerous investigations of federal and state law violations, including crimes of violence, firearms offenses, and drug trafficking.

2. The statements contained in this Affidavit are based on my experience and background as a Task Force Officer and on information provided by police officers, other agents of the FBI, and other law enforcement personnel, as well as

communications with others who have personal knowledge of the events and circumstances described herein.

3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

4. I am currently investigating Donnell CLARK, date of birth xx/xx/1999, for violations of federal law, including Interference with Commerce by Threats or Violence (Hobbs Act Robbery), in violation of 18 U.S.C. § 1951.

Probable Cause

5. Since 2023, affiant, along with other members of the Federal Bureau of Investigation Violent Crime Task Force (VCTF), have been investigating a large number of armed robberies, specifically a large number of robberies of dollar stores. As part of that investigation, VCTF began assisting the Detroit Police Department with the investigation of the armed robbery of a dollar store committed on January 5, 2023.

6. On January 5, 2023, officers of the Detroit Police Department responded to 8720 E Seven Mile Rd, Detroit, MI (Family Dollar) for a report of a robbery that had taken place. Upon arrival to the location, officers spoke with two store employees, hereinafter referred to as Adult Victim 1 (AV1) and Adult Victim 2

(AV2). AV1 was working the cash register when the robbery took place, while AV2 was working near the front entrance to the store.

7. Detroit Police interviewed AV1 and AV2 and learned the following: one of the suspects, (S1) (later identified as DONNELL LEE CLARK JR) was inside the store by himself. S1 approached AV2 and inquired about pens. S1 then left the store for a short period of time, before returning with another suspect, (S2 - later identified through DNA from the deodorant stick he touched during the robbery, but not the subject of this complaint). S1 was described as a black male wearing a white and blue jacket, blue pants, and brown Timberland style boots. S2 was described as a black male wearing a face mask with a blue zip up style hooded sweatshirt, black jeans, and black shoes. Once the two suspects were inside the store, S2 went to the register in order to purchase a stick of deodorant. S2 handed AV1 a five-dollar bill to purchase the deodorant. AV1 began to complete the transaction, and once the drawer to the register opened, S2 produced a handgun, racked the slide, and pointed it at AV1. S2 ordered AV1 to drop the money, to which AV1 complied, and S2 began taking money from the cash register. S2 told another customer in line “that shits free today” before exiting the store with S1. While the actions were taking place at the register between S2 and AV1, AV2 was being held at gunpoint by CLARK. AV2 told police that CLARK approached him for the second time, this time with a handgun pointing at the ground. CLARK

ordered AV2 to the ground, to which AV2 refused. At this time, AV2 noticed the robbery taking place at the register. CLARK and S2 then left the store together.

AV2 observed both suspects enter a silver Chevrolet Malibu and leave Southbound on E Outer Drive. Footage from inside the store confirmed the events as described.

S2 pointing the firearm at AV1:



CLARK standing at the doorway while AV2 puts his hands up:



S2 and CLARK walking in the store together:



8. Detroit Police utilized camera systems in the area which are maintained by the Detroit Police Department's Project Greenlight initiative and discovered a silver Chevrolet Malibu in the area as described by AV2 traveling at a high rate of speed at a time consistent with fleeing the robbery. Detroit Police license plate readers in the same area were then queried and it was discovered that the vehicle observed had Michigan license plate EHY6617. The plate was queried in the Law Enforcement Information Network (LEIN) and Secretary of State (SOS) and it was discovered that the plate belongs on a 2015 Chevrolet Malibu registered to DONNELL LEE CLARK, JR., later determined to be S1.

9. On January 11, 2023, upon identifying the owner of the vehicle, a photo lineup, commonly referred to as a "six pack," was compiled and presented to AV1 and AV2. Both victims identified the photo of DONNELL LEE CLARK, JR. as S1. With the positive identification of CLARK, Detroit Police issued a BOL "Be on Lookout" message to area departments marking the vehicle and CLARK as wanted in connection with the armed robbery.

10. On January 15, 2023, Eastpointe Police conducted surveillance on CLARK's residence within their city as a result of the BOL issued by Detroit Police. Eastpointe police observed CLARK exit the residence and enter the Chevrolet Malibu. Eastpointe police conducted a traffic stop and took CLARK into custody. CLARK was turned over to Detroit Police custody, along with the

custody of the Chevrolet Malibu and CLARK's cell phone.

11. On May 23, 2024, I obtained a search warrant from United States Magistrate Judge Kimberly Altman to search the content of CLARK's cell phone. While looking through the content of the forensic analysis, commonly known as a phone dump, your affiant discovered the following: multiple photographs of CLARK with firearms, photos of CLARK in front of the Chevrolet Malibu, photos of CLARK wearing the same mask as the one worn in the robbery, and photos of CLARK wearing the same jacket as the one worn in the robbery (see below). The photos of CLARK in the mask were positively identified based on matching tattoos from other photos in the phone in which he is not wearing a mask.

Photo from inside the store during the robbery, showing the clothing and mask:



Same photo from the robbery, zoomed in on the mask:



Photo obtained from CLARK's cell phone, showing him wearing the same mask worn in the robbery, standing in front of the vehicle used in the robbery:



Photo taken from CLARK's phone showing tattoos confirming the masked photo as him:



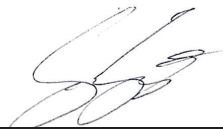
Photo from CLARK's phone showing him wearing the same jacket that was worn in the robbery, armed with a handgun:



Conclusion

12. Based on the above information, affiant believes probable cause exists that on January 5, 2023, in the City of Detroit, County of Wayne, CLARK, interfered with commerce by robbery, in violation of 18 U.S.C. §1951.

Respectfully submitted,



John Cozzi, Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: March 4, 2025